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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

OKLAHOMA TURNPIKE AUTHORITY

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July 15, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D. C. 20554

Re: RM No. 8013

Dear Ms. Searcy:

I am writing on behalf of the Oklahoma Turnpike Authority to oppose the rule-making petition (RM No. 8013) filed by PacTel Teletrac with the Federal Communications Commission. We understand that this petition relates to the rules pertaining to automatic vehicle monitoring (AVM) systems.

The Oklahoma Turnpike Authority is an instrumentality of the State of Oklahoma that operates over 563 miles of toll roads in the State of Oklahoma. The Oklahoma Turnpike System includes approximately 261 miles of turnpikes designated as interstate highways serving from northeast Oklahoma near the Kansas-Missouri State lines to southwest Oklahoma near the Texas State line. The remainder of turnpikes are designated as U.S. highways and/or serve as urban highways in the Oklahoma City and Tulsa metropolitan areas.

We understand the effect of this petition is to grant to PacTel and similar users exclusive use of the 904-912 MHz and 918-926 MHz bands. We are opposed to this because it would deny us the electronic toll collection operations and for planned future applications of AVM equipment in Oklahoma.

We began using the AVM equipment (which we market under the name of "PIKEPASS") in January of 1991 as our primary means of collecting tolls. As you can see from the following information, the electronic toll collection is a vital part of our daily operations:

- 130,000 transponder tags have been issued to date and it is anticipated that 250,000 will be reached by 12/31/92;

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- 219 toll lanes on 10 turnpikes are equipped with the AVM equipment;
- Approximately 20,000,000 toll transactions are expected to be electronically recorded in 1992.

We experience steady increases in these numbers over time and anticipate substantial future growth of AVM use and possible additions to the system from time to time. For your information, plans are underway to install AVM equipment at the Oklahoma City and Tulsa airports also. Moreover, some of our neighboring states, such as New Mexico, have implemented AVM equipment at the "weigh station" ports of entry into their state.

The Oklahoma toll collection system differs from the typical toll collection system in that "barriers" are not used in Oklahoma. The Oklahoma system is completely open in the sense that it is not necessary for patrons that use the AVM equipment to stop (or even slow) their vehicles and pay tolls at a barrier plaza. Tolls are electronically collected using readers installed on aerial structures. This enables the toll patrons to continue to drive at highway speeds. Those customers that desire to pay the toll with cash are required to exit the turnpike.

The use of this AVM technology has produced many benefits to us and our customers. We have been able to increase the number of toll roads from six to ten without increasing our staff and have achieved a 50% reduction in operating costs. This reduction in expenses has been passed along to the toll customers that use the AVM system in the form of a reduction in the toll prices. Moreover, our customers like the AVM technology because their tolls can be collected without delaying their drive. For your information, major trucking concerns like Wal-Mart Stores, J.B. Hunt, Yellow Freight Systems, Roadway Express, and others have tagged all or a substantial portion of their trucking fleet with PIKEPASS compatible tags. Because of the convenience of using the PIKEPASS and the reduced cost, approximately 30% of all tolls collected on the Oklahoma toll roads are collected through AVM.

Our AVM system operates in the 902-928 MHz frequencies and requires use of nearly all of the channels available in these bands because we presently have up to 6 lanes of traffic simultaneously passing through the AVM monitoring stations and because readers in adjacent lanes require 2 MHz separation to avoid cross interference.

As noted above, PacTel is requesting exclusive use of a large portion of the 902-928 MHz spectrum. We believe that the Commission should continue to allow the shared use of this spectrum, as it has historically done for approximately 20 years, so that we and other beneficial users of this portion of the spectrum may continue to enjoy the benefits of this resource. We believe an exclusive grant to PacTel to be particularly

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inappropriate, since as we understand it, PacTel has fewer than 5,000 subscribers nationwide. This is less than 4% of our current customer base.

We urge the Commission to preserve the amount of the 902-928 MHz spectrum that is currently available for use in AVM applications in Oklahoma and across the country.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Richard L. Ridings".

Richard L. Ridings
Chief Executive Officer

RLR:mjm